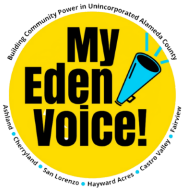
PUBLIC COMMENT
COMMISSION AGENDA ITEM 14A



East Bay Housing Organizations

Jan 27, 2026

RE: MTC Resolution No. 4740. One Bay Area Grant (OBAG 4) Funding Framework

Dear MTC Commissioners:

We are writing in support of maintaining and improving strong and enforceable Affordable Housing and Commercial Stabilization Policies as a part of the previously-adopted Transit-Oriented Communities Policy (TOC), and for linking compliance with the TOC Affordable Housing & Commercial Stabilization policies as a condition for receiving One Bay Area Grant (OBAG) funding.

As our regional planning agency, it is MTC's duty to ensure that our region is an affordable place, where even low-income workers can afford to live close to where they work. MTC is able to influence regional policy through the awarding of grants and the community has been pushing for a long time for MTC to more strongly condition its funding on beneficial policies and we see the TOC as a strong first step towards that vision.

Equitable access to affordable housing is a central goal of Plan Bay Area 2050, and the TOC's Affordable Housing and Commercial Stabilization Policies further that goal. These policies help protect our existing communities, especially Equity Priority Communities, while building new housing and increasing transit ridership.

Keeping people in their homes through tenant protections, preserving existing affordable housing, and expanding supply through new affordable housing production are all critical to

meeting our climate goals. The housing affordability crisis has coincided with a boom in extreme commutes — since 2010, the number of Bay Area residents who commuted 90-minutes or more each way to work has doubled.[1] Per BAHFA's eviction study, over 20,000 eviction lawsuits were filed in the Bay Area between July 2023 and June 2024,[2] forcing people further away from job centers.

As MTC works to create a final proposal, we hope you will incorporate the following provisions, which are critical for the success of the policy:

Instead of a small set-aside, *all* OBAG funding to individual jurisdictions, whether it comes from the regional or county/local pot, should be conditioned on compliance with TOC's Affordable Housing and Commercial Stabilization Policies, similar to existing OBAG requirements that jurisdictions comply with MTC's Pavement Management Program and Complete Streets policies. The very concept of a small "TOC Set-Aside" substantially weakens the ability of the TOC policy to meaningfully incentivize communities to align with regional policy. OBAG funds are scarce regional resources. Conditioning funding on TOC compliance is not a penalty for jurisdictions, it is an incentive. Conditioning **all** local OBAG funding on TOC compliance is simple to administer and avoids further difficult conversations about how unexpected funding needs will affect the TOC funding.

For the TOC to have real-world impact, The adopted policy should not include credit for "work in progress," which would not incentivize or ensure that policies are actually adopted, or credit for simply meeting California state law — since the California Tenant Protection Act will sunset in 2030, and Bay Area 2050 explicitly calls for strengthening tenant protections "beyond state law."

MTC should either choose to eliminate the scoring criteria entirely or, at minimum, make it impossible for jurisdictions to use the point system to avoid fully complying with the Affordable Housing and Commercial Stabilization section. We need all three Ps to stop displacement, allow people to live near where they work, and reduce our greenhouse gas emissions. Full compliance should be a threshold requirement; competitive points could be awarded for exceeding those minimum requirements.

It is critical that the tenant protections menu, so key for preventing displacement and thus reducing commute times and VMT, stays intact. Unlike the other three sections, which are prescriptive and objective standards distinguished only by transit service tiers, the Affordable Housing and Commercial Stabilization Section uses an extensive menu-based system of policy options that already provides substantial flexibility for local jurisdictions. Full compliance requires adoption of just two policies for each of the three P's plus commercial stabilization, with additional flexibility in terms of how those policies are

[1] PolicyLink/USC Equity Research Institute, Bay Area Equity Atlas, bayareaequityatlas.org.
[2] BAHFA, Evictions in the Nine-County Bay Area, https://mtc.ca.gov/about-mtc/authorities/bay-area-housing-finance-authority/bahfa-programs/bay-area-eviction-study.

implemented. This approach allows jurisdictions substantial discretion to adopt those policies best tailored to local circumstances. The standards contained here are the result of an extensive consultation process with many compromises. Please do not weaken the policy further by allowing partial adoption or implementation to count as compliance.

As a region, it is critical that we work together to advance our climate and housing equity goals, and those goals can only be reached if every Bay Area resident, regardless of income, has access to safe, stable, and affordable housing near their work and community. The TOC's Affordable Housing and Commercial Stabilization Policies are an important tool for incentivizing jurisdictions to take meaningful actions to advance Plan Bay Area 2050.

Thank you for your consideration.

Sincerely,

Emily Wheeler
Public Advocates

Leah Simon-Weisberg
Movement Legal

Shanti Singh
Tenants Together

Zack Deutsch-Gross
Transform

Todd Benson
Faith in Action East Bay

Violet Wulf-Saena & Cade Cannedy
Climate Resilient Communities

Karyl Eldridge
One San Mateo

Kenia Najar Miranda
Youth United for Community Action (YUCA)

Dave Thompson
My Eden Voice

Amanda Chang
Urban Habitat

Quintin Mecke
Council of Community Housing Organizations

Jeff Levin
East Bay Housing Organizations

Omar Carrera
Canal Alliance

Regina Celestin Williams
Silicon Valley at Home